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UNITED STATES DISTRICT COURT
DISTRICT OF NEVADA

Cung Le, Nathan Quarry, Jon Fitch, Brandon
Vera, Luis Javier Vazquez, and Kyle
Kingsbury on behalf of themselves and all
others similarly situated,

Plaintiffs,

v.

Zuffa, LLC, d/b/a Ultimate Fighting
Championship and UFC,

Defendant.

Case No.: 2:15-cv-01045-RFB-(PAL)

**JOINT AGREED MOTION TO
EXTEND MOTION FOR
SUMMARY JUDGMENT
OPPOSITION AND REPLY BRIEF
DEADLINES AND FOR LEAVE TO
FILE SUMMARY JUDGMENT
BRIEFING MATERIALS IN
EXCESS OF PAGE LIMITS
IMPOSED BY LOCAL RULE 7-3**

(First Request for Extension of Time)

Pursuant to Local Rule IA 6-1 and Local Rule 7-3(c), Plaintiffs Cung Le, Nathan Quarry, Jon Fitch, Brandon Vera, Luis Javier Vazquez, and Kyle Kingsbury (“Plaintiffs”) and Defendant Zuffa, LLC (“Zuffa”) (Zuffa and Plaintiffs collectively, “the Parties”), by and through their undersigned attorneys, move to extend the deadlines for Plaintiffs’ Opposition to Defendant’s Motion for Summary Judgment and Defendant’s Reply in Support of its Motion for Summary Judgment, and for leave to file summary judgment briefing in excess of the page limits imposed by Local Rule 7-3(a). The Parties seek to extend the deadlines set forth in the Second Stipulated Discovery Plan and Scheduling Order, ECF No. 513, for Plaintiffs’ Opposition to Zuffa’s Motion for Summary Judgment—presently due September 14, 2018—and Zuffa’s Reply in Support of its Motion for Summary Judgment—presently due October 26, 2018—by one week.

The Parties have met and conferred, reached an agreement, and now jointly move to extend the deadlines for Plaintiffs’ Opposition to Zuffa’s Motion for Summary Judgment and Zuffa’s Reply in Support of its Motion for Summary Judgment by one week. This proposed extension would alter the deadline for Plaintiffs’ Opposition to Zuffa’s Motion for Summary Judgment from September 14, 2018 to September 21, 2018 and for Zuffa’s Reply in Support of its Motion for Summary Judgment from October 26, 2018 to November 2, 2018. *See* ECF No. 513.

On July 27, 2018, the Parties jointly moved the Court to permit the Parties to allocate additional pages for their summary judgment briefing. *See* ECF No. 570. On July 30, 2018, Zuffa filed its Motion for Summary Judgment. *See* ECF No. 573. The Parties have since met and conferred, reached a subsequent agreement, and now jointly move the Court to permit the Parties to allocate 45 pages for Plaintiffs’ Opposition to Zuffa’s Motion for Summary Judgment and 27 pages for Zuffa’s Reply in Support of its Motion for Summary Judgment. The Parties intend for the page limits proposed herein to incorporate and supersede the page limits requested in their previous Joint Motion, ECF No. 570.

The table below summarizes the Parties’ proposal:

Brief	Current LR 7-3(a) Limit	Proposed Limit	Current Deadline	Proposed Deadline
Zuffa's Motion for Summary Judgment	30 pages	40 pages ¹	--	--
Plaintiffs' Opposition to Zuffa's Motion for Summary Judgment	30 pages	45 pages ²	September 14, 2018	September 21, 2018
Zuffa's Reply in Support of its Motion for Summary Judgment	20 pages	27 pages	October 26, 2018	November 2, 2018

The proposed page limits, as outlined above, incorporate the 40 page limit for Zuffa's Motion for Summary Judgment that was requested in the Parties' previous Joint Motion, ECF No. 570, and are otherwise intended to supersede the page limits previously requested. The Parties have submitted a Proposed Order with the present Motion that incorporates all of the terms specified above, and believe that in light of the superseding Proposed Order, ruling on the previous Motion, ECF No. 570, is no longer necessary.

The Parties have good cause to seek to exceed the Local Rule 7-3(a) page limits as the record is extensive and the issues to be addressed in the Parties' Summary Judgment briefing are substantial and susceptible of lengthy exposition. For these reasons, good cause exists to grant an extension of the Local Rule 7-3(a) page limits. *See Jacobs v. Clark Cty. Sch. Dist.*, 373 F. Supp. 2d 1162, 1168 (D. Nev. 2005) (granting a motion to exceed the page limit requirements of the District of Nevada's Local Rules where the issues to be addressed "are substantial and susceptible of lengthy exposition"). The Parties agree that additional time to file these briefs is necessary in order to adequately address the breadth of the issues involved.

The Parties respectfully request that the Court extend the deadlines set forth in the Second Stipulated Discovery Plan and Scheduling Order, ECF No. 513, as specified above, that the Court find that good cause exists, and that the Court grant leave to file Summary Judgment briefing materials in excess of the page limits specified by Local Rule 7-3(a) as specified above.

¹ The 40 page limit includes Zuffa's Statement of Undisputed Material Facts.

² The 45 page limit includes Plaintiffs' Counterstatement of Undisputed Material Facts.

1 Dated: August 28, 2018

Dated: August 28, 2018

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ATTESTATION OF FILER

The signatories to this document are myself and Stacey Grigsby, and I have obtained Ms. Grigsby's concurrence to file this document on her behalf.

Dated: August 28, 2018

/s/ Eric L. Cramer

CERTIFICATE OF SERVICE

I hereby certify that on this 28th day of August, 2018 a true and correct copy of the **Parties' Joint Agreed Motion to Extend Motion for Summary Judgment Opposition and Reply Brief Deadlines and for Leave to File Summary Judgment Briefing Materials in Excess of Page Limits Imposed By Local Rule 7-3** was served via the United States District Court CM/ECF system on all parties or persons requiring notice.

/s/ Eric L. Cramer